

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**UNITED STATES OF AMERICA, *et al.*,**

*Plaintiffs,*

**v.**

**APPLE INC.,**

*Defendant.*

**Case No. 2:24-cv-04055 (JXN) (LDW)**

**STIPULATION AND [PROPOSED] ORDER RE BRIEFING  
SCHEDULE ON MOTION TO DISMISS**

Plaintiffs United States of America, and the State of New Jersey, State of Arizona, State of California, District of Columbia, State of Connecticut, State of Maine, State of Michigan, State of Minnesota, State of New Hampshire, State of New York, State of North Dakota, State of Oklahoma, State of Oregon, State of Tennessee, State of Vermont, and State of Wisconsin, acting by and through their respective Attorneys General (collectively, “Plaintiffs”), and Defendant Apple Inc. (“Defendant”), hereby stipulate as follows:

WHEREAS, Plaintiffs filed their Complaint on March 21, 2024;

WHEREAS, Defendant waived service of the Complaint pursuant to Fed. R. Civ. P. 4(d);

WHEREAS, Defendant intends to file a motion to dismiss pursuant to Fed. R. Civ. P. 12;

WHEREAS, the Court’s judicial preferences require Defendant to submit a letter requesting a pre-motion conference before filing its motion to dismiss;

THEREFORE, in the interest of efficiency, the parties agree and stipulate to the following schedule:

1. Defendant will submit its letter requesting a pre-motion conference on or before May 21, 2024;
2. Plaintiffs will submit their written response to Defendant's letter on May 30, 2024;
3. If the Court determines either that it cannot resolve the dispute at the pre-motion conference or that a conference would not be helpful, Defendant will file its motion to dismiss 7 days after such determination, but in no event sooner than June 17, 2024;
4. Plaintiffs will file their opposition 35 days after Defendant files its motion; and
5. Defendant will file its reply 21 days after Plaintiffs file their opposition.

Dated: May 13, 2024

/s/ Jonathan H. Lasken

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*Attorneys for Plaintiff United States of America*

Dated: May 13, 2024

/s/ Isabella R. Pitt

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Dated: May 13, 2024

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Dated: May 13, 2024

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*Attorneys for Defendant Apple Inc.*

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

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HON. JULIEN XAVIER NEALS  
United States District Judge